August 27, 2014

Document Processing Desk (REGFEE)
ATTN: Mr. Kable Bo Davis, PM 25
Registration Division (7504P)
U.S. Environmental Protection Agency
Office of Pesticide Programs
Room S-4900, One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202-4501

WRA

Wagner Regulatory Associates, Inc.
P.O. Box 640
7217 Lancaster Pike, Suite A

Hockessin, Delaware 19707

Dear Mr. Davis:

Re: Willowood Propanil Technical, EPA Registration Number 87829-1

Amendment to Add an Unregistered Source of Technical Grade Active Ingredient

Wagner Regulatory Associates, Inc., on behalf of Willowood Propanil, LLC respectfully submits the following documents in order to amend the existing registration to add an unregistered source of technical grade active ingredient:

- Letter from Willowood Propanil, LLC appointing Wagner Regulatory Associates, Inc. as its agent
- Application for Pesticide Registration (8570-1)
- Alternate Confidential Statement of Formula (8570-4), 2 copies
- Data Matrix (8570-35)
- Certification with Respect to Citation of Data Form (8570-34)
- Data Transmittal Document
- 3 copies of data as outlined in the Data Transmittal Document

For the determination of the PRIA3 registration service fee, this application qualifies as EPA category R351, fee \$12,596. The fee has been paid through www.pay.gov and a copy of the payment acknowledgement is attached.

Please feel free to contact me via email at cheryl@wagnereg.com or telephone at (302) 635-7289 if you have any questions.

Respectfully submitted,

Cheryl Wagner

Agent for Willowood Propanil, LLC

Enclosures

DATA TRANSMITTAL DOCUMENT

1. Name and Address of Submitter

Willowood Propanil, LLC c/o Wagner Regulatory Associates PO Box 640 Hockessin, DE 19707

2. Regulatory Action In Support Of Which This Package Is Submitted

Willowood Propanil Technical EPA Reg. No. 87829-1 Amendment to add unregistered source of TGAI to Confidential Statement of Formula

3. Transmittal Date

August 27, 2014

4.	List of	f Submitted Stud	lies

Propanil Technical - Product Identity and Composition, Description of beginning materials, Manufacturing process, and Discussion of formation of impurities, Data Requirement OPPTS 830.1550; 830.1600; 830.1620; 830.1650, 830.1670

Preliminary Analysis of Five Representative Production Batches of Propanil Technical Grade Active Ingredient (TGAI) to Determine Percent Propanil and to Quantify its Associated Impurities, Guidelines: 830.1700 & 830.1800

Propanil Technical: Toxicological Assessment of Impurities, Guideline 830.1650

Company Official:	Cheryl Wagner Name	Cheek Wagner Signature
Company Name:	Wagner Regulatory Associates, Inc. Agent for Willowood Propanil, LLC	•••••
Company Contact:	Cheryl Wagner	(302) 234-2789
	Name	Phone